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July 27, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor
FROM: Susan M. White, Senior Reclamation Biologist *SMW*
RE: Tank Seam Proposal, Co-Op Mining Company, Bear Canyon Mine, ACT/015/025, Folder #2, Emery County, Utah

Synopsis and Analysis

The operator of Bear Canyon Mine has submitted a proposal to construct a road and portal pad to gain access to the Tank Seam. The proposal has several deficiencies as noted below.

1. No data has been presented to demonstrate which vegetative success standards the operator will use, such as a reference area, and how those standards compare with the premine disturbance.

2. The Threatened and Endangered species discussion provided on page 9-10A must be updated.

3. A discussion must be provided to the effect that an interim seed mixture will be used to stabilize the soil surface in the event that slopes are regraded prior to the fall seeding window.

4. The operator proposes that the vegetated cut slopes will serve as a BTCA area. No demonstration of success for this technique has been seen on the disturbed area. In fact the operator has had very little success in establishing vegetation on steep cut slopes without the reapplication of topsoil.

5. The operator has not demonstrated that the cut and fill slopes or the reclaimed slopes will be stable. A permanent vegetative cover will not establish on areas in which mass stability of the soil surface is not provided. The operator has not described a construction plan which assures that the disturbance will be contained within the proposed disturbance boundaries.



Recommendation

The proposal cannot be accepted due to deficiencies as noted above. Most important is the fact that the operator has not provided enough information to make a finding of reclaimability.